

Vincent D. Commisa, Esq. (VC-1594)

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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In the Matter of:

DEREK BERNARD BATTLE

Debtor.

Case No. 19-23697

Chapter 13

Hearing Date: 6 August 2019
@ 9:00 a.m.

**NOTICE OF MOTION TO EXTEND THE AUTOMATIC STAY
PURSUANT TO BANKRUPTCY CODE § 362(c)(3)(B), et seq.**

TO: Honorable Michael B. Kaplan
Judge, U.S. Bankruptcy Court
U.S. Courthouse, 2nd Floor
402 East State Street
Trenton, New Jersey 08608

Office United States Trustee
One Newark Center, Suite 2100
Newark, New Jersey 07102

Albert Russo
Standing Chapter 13 Trustee
Robbinsville, NJ 08691

Nicholas V. Rogers
Phelan Hallinan Diamond & Jones, PC
400 Fellowship Road
Suite 100
Mt Laurel, NJ 08054

Sir/Madam:

PLEASE TAKE NOTICE that on 6 August 2019 at 9:00 am or soon thereafter as counsel may be heard, the undersigned, Vincent D. Commisa, Esq., the attorney for the Debtor, Derek Bernard Battle, will move before the Honorable Michael B. Kaplan, Judge,

U.S. Bankruptcy Court, U.S. Courthouse, 2nd Floor, 402 East State Street, Trenton, New Jersey 08608 for an Order Extending the Automatic Stay;

PLEASE TAKE FURTHER NOTICE that in support of the Motion, Debtor will rely upon the Certification of Derek Bernard Battle in support of the relief together with the relief sought;

PLEASE TAKE FURTHER NOTICE that pursuant to Local Rule 3(c), no brief is necessary as the issues are not complex and are factual in nature as set forth in the Certification of Debtor, and a reading of the within Motion indicates the grounds upon which the movant makes this Motion.

PLEASE TAKE FURTHER NOTICE that oral is waived if no objections are filed.

Attorney for Debtor

/s/ Vincent D. Commisa
Vincent D. Commisa, Esq.

DATED: 22 July 2019